

I am writing in opposition to the Partners-SSH merger. My opposition is based upon 2 concerns:

1. Partners is already the most expensive hospital system by a significant margin. SSH is already the most expensive community hospital (excluding rural community hospitals such as Martha's Vineyard Hospital). These excessive costs have not increased the quality of care, which is comparable to other less expensive hospitals. Combining these very high-cost organizations will continue to excessively escalate costs, in spite of your best attempts via a settlement agreement.

2. Even more important and overlooked by many parties, is the size of the Partners physician network and the impact on the marketplace in the very near future and ultimately the growth in healthcare costs. With the proposals under consideration, Partners has the ability to significantly increase the referrals to its high-cost hospitals through its newly designed & reconstituted physician network, again in spite of your best attempts via a settlement agreement. Though the agreement limits the growth of the physician network, it does not address physician assistants and nurse practitioners who are providing more and more of the patient care. Additionally, because it can be significantly reconstituted, the size of the network going forward allows for significant redirection of business to these high cost hospitals. Specifically, on the South Shore, Partners is acquiring the largest independent physician group in Harbor and SSH has an agreement in place to control the 2nd largest physician group in SSMC. In a very short period of time, the South Shore physician marketplace could be materially controlled by Partners. Immediately redirecting even a small amount of business to high cost hospitals and/or increasing prices charged by these physicians after your settlement period is over will significantly increase costs.

Please reconsider your settlement agreement. It will not stop the escalation of health care costs.